

THE HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

NATIONAL PRODUCTS, INC.

Plaintiff

v.

SCOPE MOUNTED ELECTRONICS,
LLC, ATTACHIT, LLC, and APPLE
CREEK WHITETAILS, LLC

Defendants

Case No. 2:17-cv-00014-RSL

STIPULATED MOTION AND ORDER TO
EXTEND TIME TO RESPOND TO
COMPLAINT AND INITIAL
SCHEDULING DATES

Defendants Scope Mounted Electronics, LLC, AttachIt, LLC, and Apple Creek
Whitetails, LLC (“Defendants”) and Plaintiff National Products, Inc. (“Plaintiff”), by and
through their respective counsel, jointly move as follows:

WHEREAS, Plaintiff filed its Complaint in this Court on January 5, 2017;

WHEREAS, Defendants Apple Creek Whitetails, LLC and AttachIt, LLC were served on
January 12, 2017, and the current deadline for their answers or responses under Rule 12(b) is
February 2, 2017;

WHEREAS, Defendant Scope Mounted Electronics, LLC was served on January 13,
2017, and the current deadline for its answer or response under Rule 12(b) is February 3, 2017;

1 WHEREAS, the Court set Initial Scheduling Dates in its Order dated January 9, 2017
2 (Dkt. No. 4) as follows:

3 Deadline for FRCP 26(f) Conference: 2/6/2017
4 Initial Disclosures Pursuant to FRCP 26(a)(1): 2/13/2017
5 Combined Joint Status Report and Discovery
6 Plan as Required by FRCP 26(f)
7 and Local Civil Rule 26(f): 2/21/2017;

8 WHEREAS, the above-captioned action was subsequently reassigned to the Honorable
9 Robert S. Lasnik on February 1, 2017 (Dkt. No. 13);

10 WHEREAS, Defendants have stated that they require additional time to evaluate the
11 allegations in the Complaint, and Plaintiff agrees to extend the time for all defendants to answer
12 or respond to the Complaint;

13 WHEREAS, the parties agree that additional time is needed after Defendants have
14 answered or responded to the Complaint to hold the FRCP 26(f) conference and make initial
15 disclosures pursuant to FRCP 26(a)(1);

16
17 STIPULATION

18 Therefore, the parties agree and respectfully request that the Court enter an order
19 extending the time for all defendants to answer or respond under Rule 12(b) and extending the
20 initial scheduling deadlines as follows:

- 21 1. Extend the time for Defendants to answer or respond under Rule 12(b) to March 3,
22 2017;
23 2. Extend the deadline for the parties' FRCP 26(f) conference to March 17, 2017;
24 3. Extend the deadline for initial disclosures pursuant to FRCP 26(a)(1) to March 24,
25 2017; and
26

4. Extend the deadline for the combined joint status report and discovery plan as required by FRCP 26(f) and Local Civil Rule 26(f) to April 3, 2017.

STIPULATED TO and DATED this 1st day of February, 2017.

BY:

/s/ Matthew N. Miller
Matthew N. Miller, WSBA 48704
Email: matthew@mohriplaw.com
Mohr IP Law Solutions, P.C.
522 SW 5th Avenue, Suite 1390
Portland, OR 97204
Telephone: 503-336-1214
Attorney for Defendants Scope Mounted Electronics, LLC, AttachIt, LLC, and Apple Creek Whitetails, LLC

/s/ Elizabeth B. Hagan
David K. Tellekson (WSBA No. 33523)
Email: dtellekson@fenwick.com
Ewa M. Davison (WSBA No. 39524)
Email: edavison@fenwick.com
Elizabeth B. Hagan (WSBA No. 46933)
Email: ehagan@fenwick.com
Jessica M. Kaempf (WSBA No. 51666)
Email: jkaempf@fenwick.com
Fenwick & West LLP
1191 Second Avenue, 10th Floor
Seattle, WA 98101
Telephone: 206.389.4510
Facsimile: 206.389.4511

Attorneys for Plaintiff National Products, Inc.

Order

Based on the foregoing stipulation of the parties, and good cause appearing, therefore:

IT IS HEREBY ORDERED THAT the deadline for Defendants to answer or respond to Plaintiffs' Complaint is extended until March 3, 2017.

IT IS FURTHER ORDERED THAT the initial scheduling dates are extended as follows:


Deadline for FRCP 26(f) Conference: 3/17/2017

Initial Disclosures Pursuant to FRCP 26(a)(1): 3/24/2017

Combined Joint Status Report and Discovery Plan as Required
by FRCP 26(f) and Local Civil Rule 26(f): 4/3/2017.

IT IS SO ORDERED.

DATED this 2nd day of February, 2017.



Robert S. Lasnik
United States District Judge

Presented by:

/s/ Matthew N. Miller

Matthew N. Miller, WSBA 48704
Email: matthew@mohriplaw.com
MOHR IP LAW SOLUTIONS, P.C.
522 SW 5th Avenue, Suite 1390
Portland, OR 97204
Telephone: 503-336-1214

*Attorney for Defendants Scope Mounted
Electronics, LLC, AttachIt, LLC, and Apple
Creek Whitetails, LLC*

/s/ Elizabeth B. Hagan

David K. Tellekson (WSBA No. 33523)
Email: dtellekson@fenwick.com
Ewa M. Davison (WSBA No. 39524)
Email: edavison@fenwick.com
Elizabeth B. Hagan (WSBA No. 46933)
Email: ehagan@fenwick.com
Jessica M. Kaempf (WSBA No. 51666)
Email: jkaempf@fenwick.com
FENWICK & WEST LLP
1191 Second Avenue, 10th Floor
Seattle, WA 98101
Telephone: 206.389.4510
Facsimile: 206.389.4511

*Attorneys for Plaintiff National Products,
Inc.*